

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

**F I L E D**

OCT 21 2005

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

**PAT COBB**

**Plaintiff,**

**vs.**

**OSU-TULSA, and FOLLETT  
COLLEGE BOOK COMPANY**

**Defendant.**

Case No. \_\_\_\_\_

**05CV 603 CVE-PJC**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Comes now the Plaintiff, and for her Cause of Action against the Defendant, and alleges and states:

1. That the Plaintiff was an employee of the Defendant, and was an employee at all times relevant to her cause of action, and the Defendant OSU was an employer at all times, and Defendant Follett was a potential employer of Plaintiff at all times. all acts or omissions took place in the Northern District, thus jurisdiction and venue are present.

2. That the Plaintiff is a qualified individual over 40 years of age.

3. That within the limitations period next preceding the filing of this action, the Defendant discriminated against the Plaintiff, *inter alia*,

- a. by engaging in conduct against the Plaintiff because of her age, thus creating a hostile working environment.
- b. by discriminating against Plaintiff in her other wages, hours and

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working conditions, and

c. by terminating the Plaintiff's employment, because of her age

d. Defendant OSU-Tulsa made disparaging remarks to Defendant Follett about Plaintiff's age, which remarks caused Defendant Follett not to hire Plaintiff when they took over the bookstore on campus, where Plaintiff worked, although other workers under 40 were hired from OSU-Tulsa by Follett.

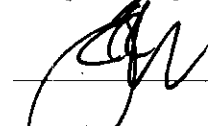
4. That the Plaintiff has exhausted all of her administrative remedies, internal and external, and has received a right-to-sue letter, within the past 90-days.

5. That the Plaintiff has been damaged in excess of \$75,000.00, in actual damages.

6. That the acts or omissions of the Defendant were wilful, wanton and malicious, giving rise to a claim for punitive damages, for which Plaintiff also prays, in excess of \$75,000.00.

WHEREFOR Plaintiff prays for a judgement in excess of \$75,000.00 actual, and in excess of \$75,000.00 punitive, for costs of this action including a reasonable attorney's fee, and for all other relief, at law or in equity.

Respectfully submitted,



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